

BEFORE
THE PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA

DOCKET NO. 2012-177-WS

IN RE: Application of Tega Cay Water)
 Service, Inc. for adjustment of)
 rates and charges and modifications)
 to certain terms and conditions)
 for the provision of water and sewer)
 service)

TESTIMONY OF MAC MITCHELL

FILED IN RESPONSE TO

PUBLIC TESTIMONY OF DECEMBER 3, 2012

1 **Q. PLEASE STATE YOUR NAME, OCCUPATION, AND BUSINESS ADDRESS.**

2 **A.** My name is Mac Mitchell; I am the Regional Manager for Utilities, Inc., the parent
3 company of Tega Cay Water Service, Inc. (TCWS). My business address is 151 Old Wire Rd.,
4 West Columbia, SC 29172.

5 **Q. IN YOUR POSITION, ARE YOU RESPONSIBLE FOR TWCS's OPERATIONS?**

6 **A.** Yes, I am. Utilities, Inc.'s Area Manager, Mike Davis, and five other Utilities, Inc.
7 employees, four of whom are licensed operators, ultimately report to me.

8 **Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?**

9 **A.** I am giving this testimony to respond to the testimony given by Mr. Steve Kunzman at
10 the public hearing held by the Commission on December 3, 2012 in Tega Cay, including his
11 PowerPoint presentation which was included in the record as Public Hearing Exhibit No. 2.

12 **Q. ARE YOU FAMILIAR WITH TCWS's LIFT STATIONS AND TREATMENT**
13 **PLANT?**

14 **A.** Yes, I am.

15 **Q. DURING THE PUBLIC HEARING HELD BY THE COMMISSION ON**
16 **DECEMBER 3rd, 2012, MR. KUNZMAN TESTIFIED REGARDING THE CONDITION**
17 **OF TCWS's LIFT STATIONS AND PLANT, DID YOU HAVE AN OPPORTUNITY TO**
18 **REVIEW HIS TESTIMONY, AND ARE YOU ABLE TO RESPOND TO THE ISSUES**
19 **AND CONCERNS THAT HE RAISED?**

1 A. Yes, I have reviewed his testimony and I was present at the hearing. I would like to take
2 this opportunity to respond to the issues and concerns raised by Mr. Kunzman with information
3 which I have compiled working with TCWS staff, specifically Area Manager, Mike Davis. I will
4 respond to Mr. Kunzman's testimony regarding specific lift stations, but I would like to begin by
5 pointing out that Mr. Kunzman did not point to one instance in which TCWS's service was
6 interrupted as a result of the conditions he pointed out regarding the lift stations.

7 **Q. PLEASE DESCRIBE TCWS' PROCEDURES FOR MAINTENANCE OF ITS**
8 **LIFT STATIONS.**

9 A. Mike Davis and his staff regularly inspect TCWS's lift stations, take required readings,
10 and perform light maintenance. We also have a two-man maintenance crew established as part
11 of our Corrective Action plan approved by the Department of Health and Environmental Control
12 (DHEC); this team that performs medium grade maintenance tasks, such as cleaning out pump
13 stations, inspecting manholes, masonry carpentry, painting, and cleaning tasks. TCWS's uses
14 outside contractors for heavy maintenance and repair. All of TCWS's lift stations are inspected
15 at least three times per week, and some critical lift stations are checked at least five times per
16 week.

17 **Q. ARE TCWS's LIFT STATIONS AND TREATMENT PLANTS INSPECTED BY**
18 **ANY REGULATORY AGENCIES?**

19 A. Yes, DHEC inspects TCWS's treatment plants on a yearly basis, and conducts periodic
20 inspections of the lift stations. The Office of Regulatory Staff also conducted an inspection of
21 our facilities after we filed this rate case.

1 **Q. WHAT WERE THE RESULTS OF THE REGULATORY INSPECTIONS?**

2 **A.** Other than a verbal request that TCWS replace an effluent sampler at one of the lift
3 stations, a minor item, we have not been alerted to any issues in 2011. Nor do I recall any issues
4 being raised in recent years.

5 **Q. ARE YOU AWARE OF ANYONE BEING INJURED AT A TCWS LIFT**
6 **STATION?**

7 **A.** No, I am not. But I also want to stress that TCWS takes safety very seriously. Mr.
8 Kunzman voiced concerns about safety during his presentation. In our testimony, we will detail
9 our response to each one of his concerns. In the future, we urge Mr. Kunzman, or any other
10 TCWS customer, to alert us to safety concerns as soon as they are noticed. If Mr. Kunzman was
11 indeed concerned about the safety of our lift stations, I am disappointed that he waited nearly one
12 month to bring them to our attention. *See Public Hearing, 12/03/2012, Tr. p. 54, ll. 9-11.*

13 **Q. HAS ANYONE BEEN INJURED AT TCWS's LIFT STATIONS OR PLANTS?**

14 **A.** I am not aware of anyone who has been injured at TCWS's lift stations or plants.

15 **Q. CAN YOU RESPOND TO MR. KUNZMAN's TESTIMONY REGARDING LIFT**
16 **STATION NO. 1?**

17 **A.** Yes. Lift Station No. 1 is located at 1077 Gauguin Lane. Mr. Kunzman testified that a
18 hinge pin was missing on a well lid was missing. However, TCWS's inspection on December 4,
19 2012, did not show the pin missing. Below, is a picture (Exhibit MM1) taken by TCWS Area
20 Manager Mike Davis showing the lid with functioning hinges.



Exhibit MM 1

Mr. Kunzman also testified that he saw the conduit pipe surrounding some electrical wires had separated, leaving the wires exposed, albeit insulated. As shown in the pictures below taken by Mike Davis, Exhibits MM3 and MM4, the conduit in question was located and repaired on December 4, 2012.



Exhibit MM2



Exhibit MM3

Q. MR. KUNZMAN INTRODUCED, AS THE SEVENTH SLIDE OF PUBLIC HEARING EXHIBIT NO. 2, A PICTURE OF WHAT APPEARS TO BE A SEWERAGE SPILL, CAN YOU RESPOND TO THIS PICTURE?

1 A. Mr. Kunzman testified that the spill in question took place on March 1, 2009. As Patrick
2 Flynn has testified in his prefiled testimony, TCWS has made substantial improvements to its
3 system as part of a Corrective Action plan approved by DHEC in 2011. As part of the
4 Corrective Action Plan, TCWS upgraded four of its lift stations (Stations 2, 3, 14, and 15) and
5 conducted a system wide inspection of the system's manholes in 2011. In the 12 months that
6 followed the inspection, TCWS cleaned approximately fifty percent of its mains. TCWS is
7 systematically inspecting additional lines going forward. One of the principal goals of this plan
8 was to reduce the incidence of sanitary sewerage overflows ("SSOs"). TCWS has been
9 successful in reducing SSOs. TCWS had 21 SSOs in the first six months of 2011, but only had 2
10 SSOs in the second six months of 2011. There have only been 8 SSOs in the past 18 months,
11 and none of the SSOs resulted in spills in Lake Wylie.

12 **Q. CAN YOU DESCRIBE LIFT STATIONS NO. 2 AND NO. 3 SHOWN ON THE**
13 **EIGHTH AND TENTH SLIDES OF MR. KUNZMAN'S TESTIMONY?**

14 A. Lift Station No. 2 is located at 2081 Marquesas Avenue and Lift Station No. 3 is located
15 at 3025 Point Clear Drive. They were upgraded as part of the Corrective Action plan in 2012.

16

1 **Q. PLEASE RESPOND TO MR. KUNZMAN'S CONCERNS REGARDING LIFT**
2 **STATION NO. 4.**

3 A. Lift Station No. 4 is located at 4013 Windward Drive. Mr. Kunzman, who visited this
4 lift station on November 4, 2012, voiced several concerns regarding Lift Station No. 4.

5 Mr. Kunzman worried that an unlocked electrical panel could pose as safety hazard. I
6 agree. It is our policy to secure all electric panels with locks. TCWS personnel visited Lift
7 Station 4 on December 4, 2012 and installed a new lock. As already stated, I wish that Mr.
8 Kunzman had brought this matter immediately to our attention.

9 Mr. Kunzman photographed some wiring on the ground. On December 4, 2012, TCWS
10 located the wires, which were mostly buried, and confirmed they were not connected to any
11 equipment. They have since been removed.

12 Finally, Mr. Kunzman was also concerned that a manhole cover was not flush; TCWS
13 replaced the riser ring on December 4th so that the lid is now flush. I also would like to assure
14 the Commission that the lid did not pose a safety hazard. While not entirely flush with the riser,
15 the lid could not be removed without a manhole tool. Furthermore, these lids weigh in excess of
16 250 lbs. and are not easily removed.

17 **Q. CAN YOU ADDRESS MR. KUNZMAN'S CONCERNS REGARDING LIFT**
18 **STATION NO. 5?**

19 A. Yes, at Lift Station No. 5, which is located at 7001 Tega Cay Dr., Mr. Kunzman was
20 concerned that the support legs on the stand for the electric meter and breaker box were rusted.
21 TCWS personnel visited Lift Station No. 5 on December 4, 2012, and the stand was upright.

1 However, as illustrated in Exhibits MM4 and MM5, the stand has since been braced to ensure its
2 continued stability.



3
4 Exhibit MM4



Exhibit MM5

5 Mr. Kunzman also pointed some tools which had been left on site by a contractor, and they have
6 been removed.

7 **Q. PLEASE RESPOND TO MR. KUNZMAN'S CONCERNS REGARDING LIFT**
8 **STATION NO. 6.**

9 A. Mr. Kunzman testified that he saw a junction box with a cover missing at Lift Station No.
10 6 at 27056 Catamaran Drive.. The cover has been replaced.

11 **Q. PLEASE RESPOND TO MR. KUNZMAN'S TESTIMONY REGARDING LIFT**
12 **STATION NO. 7.**

13 A. Mr. Kunzman's showed a photograph of an open access valve box and a mesh bag of
14 deodorant next to it. The valve box, which was full of rain water, has since been drained and
15 capped. While the valve box was not the cause of odor, sewerage systems sometimes do have
16 unpleasant smells. The deodorant shown in the photograph was in fact requested by a customer

1 who lives nearby on July 19, 2012. We are looking for a more aesthetically pleasing way of
2 placing deodorant on our sites.

3 **Q. DOES TCWS HAVE A LIFT STATION NO. 8?**

4 **A.** Yes, Lift Station No. 8 is located at 8021 Palau Court. However, Mr. Kunzman did not
5 mention this lift station in his testimony.

6 **Q. PLEASE RESPOND TO MR. KUNZMAN'S TESTIMONY REGARDING LIFT**
7 **STATION NO. 9.**

8 **A.** Mr. Kunzman reported that neighbors had seen "big trucks" with hoses at lift station
9 Number 9. TCWS's contractors do, in fact, have some large trucks equipped with hoses, and
10 they periodically service the system's lift stations.

11 **Q. MR. KUNZMAN TESTIFIED THAT HE COULD NOT LOCATE LIFT**
12 **STATIONS NO. 10. DOES TCWS HAVE A LIFT STATION NO. 10?**

13 **A.** Yes, Lift Station No. 10 is located at 10017 Bora Bora Dr. It is surrounded by
14 vegetation, which perhaps concealed it during Mr. Kunzman's inspection

15 .

1 **Q. PLEASE RESPOND TO MR. KUNZMAN'S CONCERNS REGARDING LIFT**
2 **STATION NO. 11.**

3 Lift Station No. 11 is located at 10043 Tapa Place. Mr. Kunzman testified that an
4 electrical conduit box had been left open. We have closed the box. The debris spotted by Mr.
5 Kunzman, an old float ball, has also been removed.

6 **Q. PLEASE RESPOND TO MR. KUNZMAN'S CONCERNS REGARDING LIFT**
7 **STATION NO. 12.**

8 **A.** Lift Station No. 12 is found at 11002 Cattail Bluff. Mr. Kunzman testified to finding an
9 unused alarm light which had been taped over. We have removed the alarm light, which had
10 been previously replaced with another light on a different location on the lift station. The
11 conduit pipes spotted by Mr. Kunzman, one with an open junction box, have been moved from
12 the concrete pad shown in his slides.

13 **Q. PLEASE RESPOND TO MR. KUNZMAN'S TESTIMONY REGARDING LIFT**
14 **STATION NO. 13.**

15 **A.** I agree with Mr. Kunzman's description of Lift Station 13, which is located at 8033
16 Kittridge Bay, as "very unobtrusive" and "quite a nice little station." Tr. p. 58, l: 8-10.

17

1 **Q. PLEASE RESPOND TO MR. KUNZMAN'S TESTIMONY REGARDING LIFT**
2 **STATION NO. 14 AND THE WASTE WATER TREATMENT PLANT.**

3 A. Lift Station No. 14 and TCWS Plant no. 2 are located on the Koala Circle Extension.
4 Mr. Kunzman's principal criticism of Lift Station No. 14 and the treatment plant at the location
5 is that he considers it unsightly and it is visible from the golf course. The treatment plant is, in
6 fact, visible from the golf course, as it has been for years. Its location was determined by the
7 neighborhood's original developers. The additional privacy fencing which Mr. Kunzman is
8 requesting could be installed, but it would be of limited value if he is seeking to conceal the plant
9 which is considerably taller than the fence. Furthermore, the golf course's elevation is above the
10 plant, so golfers look down on the plant, over the fence. I should also point out that Mr.
11 Kunzman's pictures show some equipment on the premises of the plant. His picture must have
12 been taken when work was being done at the plant, because this equipment is ordinarily in
13 storage.

14 **Q. PLEASE RESPOND TO MR. KUNZMAN'S TESTIMONY REGARDING LIFT**
15 **STATION NO. 15.**

16 A. Mr. Kunzman voiced several concerns about Lift Station No. 15, at 3 Pitcairín Circle.
17 Two of his slides show a manhole cover which was not flush with its riser ring due to settling.
18 We have replaced the riser ring and the cover now sits flush. However, this cover was not loose,
19 and could not be removed without a tool. Also, as I have pointed out, these manhole covers
20 weigh over 250 lbs. and are not easily moved.

21 Mr. Kunzman complained that there was an exposed pipe near the lift station. In this
22 case, the exposed pipe, which crosses a small cove in a secluded area, is unavoidable. The pipe,

which belongs to a gravity based system, must sit at a certain elevation, and it cannot be buried without blocking the flow of water in the cove. I should point out, however, that the pipe is in a wooded area that is not easily accessible, let alone visible, to the public. Additionally, the interior of the pipe has been inspected and found to be in satisfactory condition.

Mr. Kunzman also testified that he saw standing water in what he described as “unused ponds”. There is only one pond in the area, and belongs to the inactive Plant No. 4 in the system. Rain water does accumulate in the pond, and it is periodically pumped out and treated to keep mosquitoes from breeding.

Q. PLEASE RESPOND TO MR. KUNZMAN'S TESTIMONY REGARDING LIFT STATION NO. 16.

A. Mr. Kunzman spotted a wet well that was left unlocked. This should not have happened, and it has been locked.

Q. PLEASE RESPOND TO MR. KUNZMAN'S TESTIMONY REGARDING LIFT STATION NO. 17.

A. Mr. Kunzman showed a gap in the entry gate, which was chained shut, which appeared to be to be about as wide as a person's hand, also shown in the picture. We inspected the lift station on December 4, 2012, and it has been securely closed.

1 **Q. PLEASE RESPOND TO MR. KUNZMAN’S TESTIMONY REGARDING LIFT**
2 **STATION NO. 18.**

3 **A.** Mr. Kunzman pointed out a loosely chained gate at Lift Station No. 18, at 10079 Deep
4 Cove Drive and the issue has been addressed. He also showed a concrete wet well structure
5 which had some deteriorated mortar on the outside of the lid and the riser. Mr. Kunzman was
6 concerned that this structure could be a source of odors. Only the exterior mortar on the
7 structure had flaked off of the well, and the well remains sealed.

8 Mr. Kunzman also pointed out a plastic bag trash bag that had been stuffed in the back of
9 the lift station’s panel. One of our contractors left this bag at the station, and we have since
10 curtailed our reliance on this contractor. Our maintenance crew, which ordinarily takes readings
11 from the front of the panel, must not have noticed the bag during its inspections.

12 **Q. PLEASE RESPOND TO MR. KUNZMAN’S TESTIMONY REGARDING LIFT**
13 **STATION NO. 19.**

14 **A.** Mr. Kunzman showed a bucket of lime that had been left at the lift station by our
15 contractor, and it has been removed. Similarly, we have removed a spotlight and some wiring
16 that had been left at the station by the contractor. The large section of concrete riser that Mr.
17 Kunzman photographed and described as a safety hazard will also be cut up and removed. The
18 riser has apparently been there since the construction of the system, and is very heavy. It cannot
19 be moved by hand, and I do not believe that it presents a safety hazard.

20 **Q. DOES THIS CONCLUDE YOUR TESTIMONY?**

21
22 **A.** Yes it does.